



Hurricane Harvey – Texas Unified Command Mission Assignment Transition from Response to Recovery

Corpus Christi Branch Operational Activity Transition Record For Orphan Drum and Container Collection and Spills/Discharges from Facilities

To: _____,
Judge, _____ County

From: Hurricane Harvey - Texas Unified Command for Emergency Support
Function (ESF) #10 Unified Command

Thru: Susan Clewis
Region 14 Director
Texas Commission on Environmental Quality

The Unified Command (UC) has complete ESF-10 assignments under FEMA Mission Assignment number 433DRTXEPA0101 in [County] and intends transition to the recovery phase of operations. A summary of response actions is outlined below. As a result, UC is recommending initiation of an organized, thoughtful, and gradual reduction in personnel in the field to facilitate a smooth transition back to normal operations with state and local authorities.

On September 7, 2017, Texas Governor Abbott created the Governor's Commission to Rebuild Texas. EPA agreed to support the Governor's Commission to effectively coordinate the State's effort to recover and rebuild public infrastructure damaged by Hurricane Harvey and will do so under a separate FEMA Mission Assignment for Long-term Recovery if issued by FEMA. The duties of the Commission shall include: assisting local governmental entities and nonprofit organizations to assess and identify rebuilding needs and to navigate state and federal resources available for the rebuilding effort; advocating for the interests of state and local government on matters related to disaster response; and providing expertise and assistance to local governmental entities and nonprofit organizations throughout the rebuilding process.

EPA Incident Commander

Date: _____

TCEQ Incident Commander

Date: _____

Action: 1	Purpose and Background
Assignee(s):	Operations Section Chief and Branch Director
Information: FEMA Interagency Agreement (IAG) and Mission Assignment (MA): 4332-DR-TX-EPA-03 Operational Branch: Corpus Christi (Alpha) Area of Responsibility (AOR)/Counties: Aransas, Bee, Calhoun, De Witt, Goliad, Gonzales, Jackson, Kleberg, Lavaca, Nueces, Refugio, San Patricio, Victoria Operational Category: Assessment, identification, removal and disposal of orphan drums and containers; assessment, identification, abatement, containment, and mitigation of potential or actual discharges/releases from facilities. Authorized Activities: Conduct field operations to remove and dispose of oil and hazardous substances in the form of orphan drums and containers, and conduct field operations to abate, contain, and mitigate potential or actual discharges/releases from facilities. Attachment 1: Mission Assignment and Action Request Forms	

Action: 2	Findings
Assignee(s):	Operations Section Chief and Branch Director
Milestones: The Unified Command (UC) conducted response activities to mitigate exposure threats from oil and hazardous substances associated with orphan drums and containers, and potential or actual discharges/releases from facilities. These recovery efforts were focused throughout the affected areas of the Corpus Christi Branch AOR. Some orphan drums and containers were recovered in the incorporated areas while others were associated with the rural and sensitive areas (open water, marsh, and swamp areas) of the County. These orphan drums and containers appeared to have originated from land based businesses, and/or off-shore petroleum operations. All recovery efforts were conducted in such a manner as to avoid or minimize additional damage to the sensitive environments within the Corpus Christi Branch AOR. To this end, prior to beginning recovery operations in an area, both ground and aerial	

reconnaissance (where applicable) were conducted. The UC was able to gather information on recovery targets, evaluate possible access routes, temporary staging locations (if necessary), determine appropriate equipment needs, and evaluate safety considerations. The UC also assigned unique identifications in its Response Manager database for orphan drum and container targets, and facility spills/discharges.

Following the reconnaissance, the UC created tactical maps of all targets located within the Corpus Christi Branch AOR. The UC developed performance guidelines in conjunction with both State and Federal natural resources trustee agencies. The goal of the response effort was to minimize any collateral environmental damage, while mitigating hazardous material threats to public health and environment. When operations were conducted in sensitive habitats, wetlands-experienced personnel documented all activities before, during and after recovery.

The UC conducted the following best management practices and conservation measures:

- Preservation of Existing Habitats: Recovery activities were minimized and focused on the protection of existing vegetation.
- Selectivity of Recovery Equipment: Equipment was chosen and employed to avoid or minimize adverse effects to habitat and wildlife.
- Spill Prevention: Control and countermeasures were implemented to reduce the risk of spills during recovery operations.

A system of grids and zones was created to track collection progress. Upon completion of recovery operations in an area, ground and/or aerial verification was conducted.

The UC processed a total of 227 locations through Corpus Christi Branch orphan drum and container operations, and a total of [insert #s] locations through the Corpus Christi Branch facility discharge operations.

The UC conducted recovery of orphan drums and containers in Corpus Christi Branch from approximately August 28, 2017 through September [__] 2017.

Some items were left in place because they were not a hazardous material threat or the contents were emptied and the containers no longer posed a significant public health or environmental risk relative to the likely environmental impact required for removal. Other containers were left in place when owners could be identified and contacted, resulting in the owner performing removal of their items. In addition some containers or spills were referred to other state or local agencies. Containers located on federal land were referred to those agencies which own the land, such as Department of Interior or US Army Corp of Engineer. These items were not addressed under this mission assignment as Federal lands are outside the statutory authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

In Corpus Christi Branch, two (2) items remain open and will require recovery or have been referred to the Responsible Party.

The UC conducted abatement and mitigation operations regarding facility discharges/releases in Corpus Christi Branch from approximately August 28, 2017 through September [__,] 2017.

The UC identified a [insert total number] facilities that were compromised and had a potential or actual discharge/release into the environment. [Insert number] facilities were closed in Response Manager by transferring the jurisdiction to the proper state agency. [insert number] were transferred to the TCEQ, [insert number] were transferred to the TGLO, and [insert number] were transferred to the RRC. The state agencies will close out these facilities under their normal business practices.

On September [xx], 2017, TCEQ indicated they were ready to transition recovery activities from ESF-10 Unified Command back to the state.

Attachment 2: Corpus Christi Branch Map Showing Recovery Required and Left in Place Orphan Drum and Container Locations by County

Attachment 3: Table of Recovery Required and Left in Place Orphan Drums and Containers by County

Attachment 4: Chart of Orphan Drum and Container Recovery Totals by Type

Attachment 5: Table of Emptied/NonHaz and also Owner Recovered Drums and Containers Left in Place by County

Attachment 6: Table of Drums and Containers Referred to an RP or to Another Agency by County

Attachment 7: Table of Facilities/Spills Referred to an RP or to Another Agency by County

Attachment 8: Corpus Christi Branch Map Showing Open Item Facilities Referred to the State Agencies by County

Attachment 9: Corpus Christi Branch Table Showing Open Item Facilities Referred to the State Agencies by County

Action: 3	Continuously evaluate operational activities and identify decision point for completion of activity or its transition back to state and/or County.
Assignee(s):	Operations Section Chief and Branch Director
Activity Transition Criteria: Orphaned container collection continued until transitioned to the state. Aside from the targets left open or turned over to the State Agencies and/or Agency contractors, and County contractors all known hazardous material threats were mitigated, but containers that may have sunk, were hidden by debris, or were otherwise unknown to the responders may still be present.	

Action: 4	Work with County and State officials to establish a mission transition strategy (including Outreach strategy) and mission completion schedule.
Assignee(s):	Branch Director
Strategy details and schedule: Unified Command recovered all identifiable targets. Any future containers should be identified and recovered through normal business operations.	
Action: 5	Brief Agency contacts on activity completion prior to implementation.
Assignee(s):	Unified Command
Results: The Unified Command has briefed their respective agency contacts prior to transition.	

Action: 6	Concurrently Brief JFO/AFO on activity closeout prior to implementation.
Assignee(s):	Unified Command
Results: No formal briefing to the JFO/AFO will be required for this activity as each County is closed out.	

ATTACHMENT 1
CURRENT FEMA MISSION ASSIGNMENT

ATTACHMENT 2
COUNTY MAP SHOWING RECOVERY REQUIRED AND LEFT IN PLACE
ORPHAN DRUM AND CONTAINER LOCATIONS

ATTACHMENT 3
TABLE OF RECOVERY REQUIRED AND LEFT IN PLACE ORPHAN DRUMS
AND CONTAINERS

ATTACHMENT 4
CHART OF ORPHAN DRUM AND CONTAINER RECOVERY TOTALS BY
TYPE

ATTACHMENT 5
TABLE OF EMPTIED/NONHAZ OR OWNER RECOVERED DRUMS AND
CONTAINERS LEFT IN PLACE

ATTACHMENT 6
Table of Drums and Containers Recovered by RP or Referred to Another Agency

ATTACHMENT 7
Table of Facilities / Spills Recovered by RP or Referred to Another Agency

ATTACHMENT 8
Corpus Christi Branch Map Showing Open Item Facilities Referred to the State
Agencies by County

ATTACHMENT 9
Corpus Christi Branch Table Showing Open Item Facilities Referred to the State
Agencies by County